



IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA

v.

DEREK MATTHEWS,  
Defendant.

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)

No. 1:13cr153

Count 1: Conspiracy to Commit  
Bribery (18 U.S.C. § 371)

**Criminal Information**

The United States charges that:

**Count 1**  
**(Conspiracy to Commit Bribery)**

1. From in or about October 2011 through in or about February 2012, in the Eastern District of Virginia and elsewhere, the defendant, Derek Matthews, a public official, did knowingly and intentionally combine, conspire, confederate, and agree with Keith Hedman, the owner of Company A, to commit bribery, that is: to directly and indirectly corruptly demand, seek, receive, accept, and agree to receive and accept a thing of value personally in return for the defendant being (i) influenced in the performance of an official act; and (ii) being induced to do and omit to do an act in violation of the defendant's official duty, all in violation of Title 18, United States Code, Section 201(b)(2)(A) and (C).

***Purpose, Manner, and Means of the Conspiracy***

2. The purpose of the conspiracy was for Hedman, Company A, and Company B, another company Hedman controlled, to obtain U.S. government contracts for Hedman's benefit and the benefit of the companies he controlled through the defendant (i) performing official acts, including lobbying of other U.S. government officials; and (ii) otherwise violating his lawful

duties as a public official, all in return for money to be routed to the defendant by Hedman through Company B.

3. The manner and means by which the defendant and others would and did carry out the conspiracy included, but were not limited to, the following:

- a. signing a “services agreement” between the defendant and Company B to pay the defendant \$50,000 over a 12-month period through a “consulting” company the defendant maintained;
- b. communicating with Hedman over email regarding possible U.S. government contracting opportunities the defendant could help Company B procure;
- c. the defendant lobbying U.S. government officials to help Company B obtain U.S. government contracts;
- d. the defendant sharing insider information obtained from other U.S. government officials with Hedman for the purpose of helping Company B obtain U.S. government contracts; and
- e. Company B paying the defendant approximately \$4,166.67 each month from Company B’s accounts based on the \$50,000 “services agreement” and in exchange for the defendant’s assistance.

***Overt Acts***

4. In furtherance of the conspiracy and to effect the objects of the conspiracy, the following overt acts, among others, were committed in the Eastern District of Virginia and elsewhere:

- a. In or about October 2011, the defendant signed a "services agreement" between the defendant and Company B to pay the defendant \$50,000 over 12 months;
- b. On or about October 13, 2011, the defendant emailed Hedman, "I have put about 5 irons in the fire, all of which could make us all very happy and even make me take a step back from my steady if they pop";
- c. On or about October 13, 2011, Hedman emailed the defendant a website screenshot about a prospective contract with the defendant's U.S. government agency; and
- d. In or about January 2012, the defendant forwarded an email exchange to Hedman in which the defendant had recommended Company B for a contract with the defendant's U.S. government agency.

(All in violation of Title 18, United States Code, Section 371)

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